

REMARKS

The present remarks are submitted in response to the rejection entered on April 12, 2006. A request for a three month extension of time is included herein. Furthermore, a request for continued examination (RCE) is included herein. Claims 1, 6, and 10 have been amended. Reconsideration and reexamination in view of the amendments and the following arguments is respectfully requested.

Independent claims 1 and 6 are amended to stress three points: (i) that the portable memory device reader is directly connected to the portable memory device, (ii) that the portable memory device reader is not a camera and does not include any camera functionality, and (iii) that the portable memory device provides on-board storage for a camera. Claim 6 further stresses point (ii) by reciting that the portable memory device is removed from a camera before it is placed in contact with the portable memory device reader. Claim 16 is amended to correct a typographical error. The Examiner suggested that the previously submitted arguments did not correspond to the claims. Applicant respectfully submits that if that was the case¹, the present amendments to claims 1 and 6 make the claims match the submitted arguments.

When rejecting claims 1 and 6, the Examiner stated that Walters discloses the portable memory device reader recited by the claims. Applicant respectfully disagrees. Walters discloses a system in which photographs are sent from a camera to a computer, and then from that computer to a server through an Intranet. Applicants submit that neither of these elements is a portable memory device reader as recited by claims 1 and 6.

As discussed above, claims 1 and 6 require that the portable memory device reader not be a camera. Therefore, the camera disclosed by Walter may is not a portable memory device reader.

Claims 1 and 6 further recite that the portable memory device reader is directly connected to the portable memory device. In other words, there are no intermediaries (such as a camera) between the portable memory device and the portable memory device reader. Therefore, the computer described by Walter cannot be the portable memory device reader, because it is

¹ Applicant does not admit that that was the case.

connected to a camera. Since the computer of Walter communicates only with the camera, then any connection between the computer and a portable memory device within the camera, is not direct but facilitated through an intermediary (the camera). Therefore, the computer of Walter cannot be the portable memory device reader because it is not directly connected to the portable memory device as recited by claims 1 and 6. The server of Walter is not a portable memory device reader either, because it only accesses image data from the computer, and is thus removed by yet another step from the portable memory device.

Thus, Walter does not disclose any portable memory device reader as recited by claims 1 and 6.

Furthermore, Applicant notes that claims 1 and 6 recite that the portable memory device provide on board storage for a camera. Therefore, the portable memory device is not a hard-drive for the computer of Walter, or any other storage device unrelated to cameras.

Applicant notes that the additions to claims 1 and 6 are directed to a significant and inventive feature of embodiments of the present invention. That feature is (as discussed in the previous amendment) the removal of the portable memory device from the camera and its placement in a reader in order to automatically upload the images stored thereon. Thus, the above discussed embodiments bypass any proprietary formats which may be required for communication with the camera itself. Walter does not feature this benefit as it specifically requires that communications happen with the camera itself.

Therefore, claims 1 and 6, as well as claims 2-5, 7-9, 14 and 15, which depend from them, are patentable in view of the cited art.

Claim 10 is patentable because Walter does not disclose any interactive manipulating of albums. While Walter does disclose that an album in general may be created and placed on a CD, it does not disclose that the user may be allowed to create, remove and manipulate folders within the album. Therefore, claim 10, as well as claims 13, and 16 which depend from it is patentable over the cited art.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hristo Vachovsky', with a long, sweeping horizontal stroke extending to the right.

Hristo Vachovsky

55694

(917) 951 7890